## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS **HOUSTON DIVISION**

Robert Dedmon,	§	CIVIL ACTION NO.
Plaintiff,	§	4:21-cv-03371
	§	
	§	JUDGE CHARLES ESKRIDGE
vs.	§	
	§	Jury Demand
Shell Exploration &	§	
Production Company and	§	
Shell Trading Services	§	
Company,	§	
Defendants.	§	

## PLAINTIFF ROBERT DEDMON'S FIRST AMENDED WITNESS LIST

Robert Dedmon may call any witness listed in Defendants' witness list. This amended witness list does not add any new witnesses other than two witnesses listed on Defendants' Witness List [ECF Doc. 63].

Mo	compensatory damages:  before and after witnesses		
No.	WITNESS NAME	WITNESS ADDRESS	
	Keyani Adigun	2448 Baldwin Crescent NE	
	v	Washington, D.C. 20018	
	Live    Deposition		
	Fact □ Expert □ Re	cord Custodian	
	sister		
	topics: one of the witnesses who	will collectively address the non-wage	
		g comparison of Mr. Dedmon before and	
	after learning of the discrimina	tion	
Mo	Wirmaniaa Nilaan	Wirminga Apppinga	
No.	WITNESS NAME	WITNESS ADDRESS	
	Brandon Crutchfield	8700 Stacy Road #5119 McKinney, Texas 75070	
		Weightiney, Texas 75070	
	Live    Deposition		
	Fact □ Expert □ Re	cord Custodian	
	friend since high school		
	topics: one of the witnesses who will collectively address the non-wage		
	harm to Mr. Dedmon, including comparison of Mr. Dedmon before and		
		comparison of Mr. Dedmon before and	
	harm to Mr. Dedmon, including after learning of the discrimina	g comparison of Mr. Dedmon before and tion	
No.	harm to Mr. Dedmon, including after learning of the discrimina WITNESS NAME	g comparison of Mr. Dedmon before and tion  WITNESS ADDRESS	
No.	harm to Mr. Dedmon, including after learning of the discrimina	witness Address  12110 Upton Park	
No.	harm to Mr. Dedmon, including after learning of the discrimina WITNESS NAME	g comparison of Mr. Dedmon before and tion  WITNESS ADDRESS	
No.	harm to Mr. Dedmon, including after learning of the discrimina WITNESS NAME	witness Address  12110 Upton Park	
No.	harm to Mr. Dedmon, including after learning of the discrimina  WITNESS NAME  Brushaud Callis	WITNESS ADDRESS  12110 Upton Park San Antonio, Texas 78253	
No.	harm to Mr. Dedmon, including after learning of the discriminal WITNESS NAME  Brushaud Callis  Live	WITNESS ADDRESS  12110 Upton Park San Antonio, Texas 78253	
No.	harm to Mr. Dedmon, including after learning of the discriminal WITNESS NAME  Brushaud Callis  Live    Deposition  Fact    Expert   Refriend since college	WITNESS ADDRESS  12110 Upton Park San Antonio, Texas 78253  cord Custodian	
No.	harm to Mr. Dedmon, including after learning of the discriminal WITNESS NAME  Brushaud Callis  Live □ Deposition  Fact □ Expert □ Refriend since college topics: one of the witnesses who	WITNESS ADDRESS  12110 Upton Park San Antonio, Texas 78253	
No.	harm to Mr. Dedmon, including after learning of the discriminal WITNESS NAME  Brushaud Callis  Live □ Deposition  Fact □ Expert □ Refriend since college topics: one of the witnesses who	WITNESS ADDRESS  12110 Upton Park San Antonio, Texas 78253  cord Custodian  will collectively address the non-wage geomparison of Mr. Dedmon before and	
No.	harm to Mr. Dedmon, including after learning of the discriminal WITNESS NAME  Brushaud Callis  Live □ Deposition  Fact □ Expert □ Refriend since college topics: one of the witnesses who harm to Mr. Dedmon, including	WITNESS ADDRESS  12110 Upton Park San Antonio, Texas 78253  cord Custodian  will collectively address the non-wage geomparison of Mr. Dedmon before and	
No.	harm to Mr. Dedmon, including after learning of the discriminal WITNESS NAME  Brushaud Callis  Live □ Deposition  Fact □ Expert □ Refriend since college topics: one of the witnesses who harm to Mr. Dedmon, including	WITNESS ADDRESS  12110 Upton Park San Antonio, Texas 78253  cord Custodian  will collectively address the non-wage geomparison of Mr. Dedmon before and	
No.	harm to Mr. Dedmon, including after learning of the discriminal WITNESS NAME  Brushaud Callis  Live □ Deposition  Fact □ Expert □ Refriend since college topics: one of the witnesses who harm to Mr. Dedmon, including	WITNESS ADDRESS  12110 Upton Park San Antonio, Texas 78253  cord Custodian  will collectively address the non-wage geomparison of Mr. Dedmon before and	
No.	harm to Mr. Dedmon, including after learning of the discriminal WITNESS NAME  Brushaud Callis  Live □ Deposition  Fact □ Expert □ Refriend since college topics: one of the witnesses who harm to Mr. Dedmon, including	WITNESS ADDRESS  12110 Upton Park San Antonio, Texas 78253  cord Custodian  will collectively address the non-wage geomparison of Mr. Dedmon before and	

No.	WITNESS NAME	WITNESS ADDRESS
	Brooke Dedmon	1 Acosta Valley Drive
		Missouri City, Texas 77459
	Live   Deposition	
	_	cord Custodian
	wife	cora Castoaran
		will collectively address the non-wage
	-	comparison of Mr. Dedmon before and
	after learning of the discrimina	tion
)	W	VV
No.	WITNESS NAME	WITNESS ADDRESS
	Karen Dedmon	5303 Amber Sky Lane Rosharon, Texas 77583
		Hosharon, Texas 11909
	Live    Deposition	
	Fact □ Expert □ Re	cord Custodian
	mother	
	topics: one of the witnesses who	will collectively address the non-wage
		g comparison of Mr. Dedmon before and
	harm to Mr. Dedmon, including after learning of the discrimina	·
No.		tion
No.	after learning of the discrimina	·
No.	after learning of the discrimina WITNESS NAME	tion WITNESS ADDRESS
No.	WITNESS NAME  Robert Dedmon, Jr.	WITNESS ADDRESS 5303 Amber Sky Lane
No.	WITNESS NAME  Robert Dedmon, Jr.  Live	WITNESS ADDRESS 5303 Amber Sky Lane Rosharon, Texas 77583
No.	WITNESS NAME  Robert Dedmon, Jr.  Live	WITNESS ADDRESS 5303 Amber Sky Lane
No.	WITNESS NAME  Robert Dedmon, Jr.  Live    Deposition  Fact    Expert   Re  father	WITNESS ADDRESS 5303 Amber Sky Lane Rosharon, Texas 77583  cord Custodian
No.	WITNESS NAME  Robert Dedmon, Jr.  Live    Deposition  Fact    Expert   Refather topics: one of the witnesses who	WITNESS ADDRESS 5303 Amber Sky Lane Rosharon, Texas 77583  cord Custodian will collectively address the non-wage
No.	WITNESS NAME  Robert Dedmon, Jr.  Live    Deposition  Fact    Expert   Refather topics: one of the witnesses who harm to his son, including comp	WITNESS ADDRESS 5303 Amber Sky Lane Rosharon, Texas 77583  cord Custodian
No.	WITNESS NAME  Robert Dedmon, Jr.  Live    Deposition  Fact    Expert   Refather topics: one of the witnesses who	WITNESS ADDRESS 5303 Amber Sky Lane Rosharon, Texas 77583  cord Custodian will collectively address the non-wage
No.	WITNESS NAME  Robert Dedmon, Jr.  Live    Deposition  Fact    Expert   Refather topics: one of the witnesses who harm to his son, including comp	WITNESS ADDRESS 5303 Amber Sky Lane Rosharon, Texas 77583  cord Custodian will collectively address the non-wage
No.	WITNESS NAME  Robert Dedmon, Jr.  Live    Deposition  Fact    Expert   Refather topics: one of the witnesses who harm to his son, including comp	WITNESS ADDRESS 5303 Amber Sky Lane Rosharon, Texas 77583  cord Custodian will collectively address the non-wage
No.	WITNESS NAME  Robert Dedmon, Jr.  Live    Deposition  Fact    Expert   Refather topics: one of the witnesses who harm to his son, including comp	WITNESS ADDRESS 5303 Amber Sky Lane Rosharon, Texas 77583  cord Custodian will collectively address the non-wage
No.	WITNESS NAME  Robert Dedmon, Jr.  Live    Deposition  Fact    Expert   Refather topics: one of the witnesses who harm to his son, including comp	WITNESS ADDRESS 5303 Amber Sky Lane Rosharon, Texas 77583  cord Custodian will collectively address the non-wage
No.	WITNESS NAME  Robert Dedmon, Jr.  Live    Deposition  Fact    Expert   Refather topics: one of the witnesses who harm to his son, including comp	WITNESS ADDRESS 5303 Amber Sky Lane Rosharon, Texas 77583  cord Custodian will collectively address the non-wage
No.	WITNESS NAME  Robert Dedmon, Jr.  Live    Deposition  Fact    Expert   Refather topics: one of the witnesses who harm to his son, including comp	WITNESS ADDRESS 5303 Amber Sky Lane Rosharon, Texas 77583  cord Custodian will collectively address the non-wage

No.	WITNESS NAME	WITNESS ADDRESS
	Robert Dedmon IV	1 Acosta Valley Drive
		Missouri City, Texas 77459
	Live   Deposition	
	_	cord Custodian
	-	coru Custouran
	plaintiff tonics: one of the witnesses who	will collectively address the non-wage
	=	ison of how he was before and after
	learning of the discrimination	
No	Wirmyrada Marin	Wirmyngg Apppping
No.	WITNESS NAME  James Ledbetter	WITNESS ADDRESS 6307 Flewellen Falls Lane
	James Leabetter	Fulshear, Texas 77441
	Live   Deposition	
	Fact □ Expert □ Re	cord Custodian
	friend, former Shell employee	
	topics: one of the witnesses who will collectively address the non-wage	
	-	•
	harm to Mr. Dedmon, including	g comparison of Mr. Dedmon before and
	-	g comparison of Mr. Dedmon before and
No.	harm to Mr. Dedmon, including	g comparison of Mr. Dedmon before and
No.	harm to Mr. Dedmon, including after learning of the discrimina	witness Address 20462 Avelignese Way
No.	harm to Mr. Dedmon, including after learning of the discrimina WITNESS NAME	g comparison of Mr. Dedmon before and tion  WITNESS ADDRESS
No.	harm to Mr. Dedmon, including after learning of the discrimina WITNESS NAME	witness Address 20462 Avelignese Way
No.	harm to Mr. Dedmon, including after learning of the discrimina  WITNESS NAME  Shara McKinnon (Brown)  Live   Deposition	witness Address 20462 Avelignese Way
No.	harm to Mr. Dedmon, including after learning of the discrimina  WITNESS NAME  Shara McKinnon (Brown)  Live □ Deposition  Fact □ Expert □ Re	WITNESS ADDRESS  20462 Avelignese Way Tomball, Texas 77377
No.	harm to Mr. Dedmon, including after learning of the discrimina  WITNESS NAME  Shara McKinnon (Brown)  Live    Deposition  Fact    Expert    Refamily friend topics: one of the witnesses who	WITNESS ADDRESS  20462 Avelignese Way Tomball, Texas 77377  cord Custodian  will collectively address the non-wage
No.	harm to Mr. Dedmon, including after learning of the discrimina  WITNESS NAME  Shara McKinnon (Brown)  Live    Deposition  Fact    Expert    Re family friend topics: one of the witnesses who harm to Mr. Dedmon, including	WITNESS ADDRESS  20462 Avelignese Way Tomball, Texas 77377  cord Custodian  will collectively address the non-wage geomparison of Mr. Dedmon before and
No.	harm to Mr. Dedmon, including after learning of the discrimina  WITNESS NAME  Shara McKinnon (Brown)  Live    Deposition  Fact    Expert   Refamily friend topics: one of the witnesses who	WITNESS ADDRESS  20462 Avelignese Way Tomball, Texas 77377  cord Custodian  will collectively address the non-wage geomparison of Mr. Dedmon before and
No.	harm to Mr. Dedmon, including after learning of the discrimina  WITNESS NAME  Shara McKinnon (Brown)  Live    Deposition  Fact    Expert    Re family friend topics: one of the witnesses who harm to Mr. Dedmon, including	WITNESS ADDRESS  20462 Avelignese Way Tomball, Texas 77377  cord Custodian  will collectively address the non-wage geomparison of Mr. Dedmon before and
No.	harm to Mr. Dedmon, including after learning of the discrimina  WITNESS NAME  Shara McKinnon (Brown)  Live    Deposition  Fact    Expert    Re family friend topics: one of the witnesses who harm to Mr. Dedmon, including	WITNESS ADDRESS  20462 Avelignese Way Tomball, Texas 77377  cord Custodian  will collectively address the non-wage geomparison of Mr. Dedmon before and
No.	harm to Mr. Dedmon, including after learning of the discrimina  WITNESS NAME  Shara McKinnon (Brown)  Live    Deposition  Fact    Expert    Re family friend topics: one of the witnesses who harm to Mr. Dedmon, including	WITNESS ADDRESS  20462 Avelignese Way Tomball, Texas 77377  cord Custodian  will collectively address the non-wage geomparison of Mr. Dedmon before and
No.	harm to Mr. Dedmon, including after learning of the discrimina  WITNESS NAME  Shara McKinnon (Brown)  Live    Deposition  Fact    Expert    Re family friend topics: one of the witnesses who harm to Mr. Dedmon, including	WITNESS ADDRESS  20462 Avelignese Way Tomball, Texas 77377  cord Custodian  will collectively address the non-wage geomparison of Mr. Dedmon before and
No.	harm to Mr. Dedmon, including after learning of the discrimina  WITNESS NAME  Shara McKinnon (Brown)  Live    Deposition  Fact    Expert    Re family friend topics: one of the witnesses who harm to Mr. Dedmon, including	WITNESS ADDRESS  20462 Avelignese Way Tomball, Texas 77377  cord Custodian  will collectively address the non-wage geomparison of Mr. Dedmon before and
No.	harm to Mr. Dedmon, including after learning of the discrimina  WITNESS NAME  Shara McKinnon (Brown)  Live    Deposition  Fact    Expert    Re family friend topics: one of the witnesses who harm to Mr. Dedmon, including	WITNESS ADDRESS  20462 Avelignese Way Tomball, Texas 77377  cord Custodian  will collectively address the non-wage geomparison of Mr. Dedmon before and

No.	WITNESS NAME	WITNESS ADDRESS
1,0,	Jamal Porter	19808 Eire Drive
		Pflugerville, Texas 78660
		Simon Property Group
		2901 South Capital of Texas Highway
		Austin, Texas 78746
	■ Live □ Deposition	
	Fact □ Expert □ Re	cord Custodian
	friend since college	
		will collectively address the non-wage
	-	g comparison of Mr. Dedmon before and
	after learning of the discrimina	
No.	WITNESS NAME	WITNESS ADDRESS
	Brandon Saunders	Bell's Life Enhancement
		6302 Highway 6, Suite K
		Missouri City, Texas 77459
	<b>T</b> . <b>D</b>	
	Live □ Deposition	
	$\blacksquare$ Fact $\square$ Expert $\square$ Re	cord Custodian
	friend	
	topics: one of the witnesses who	will collectively address the non-wage
	harm to Mr. Dedmon, including	g comparison of Mr. Dedmon before and
	after learning of the discrimina	tion
No.	WITNESS NAME	WITNESS ADDRESS
	Jasmine Turner	Alchemy Counseling and Wellness, PLLC
		1011 Augusta Drive, Ste #107
		Houston, Texas 77057
	Live   Deposition	
		ecord Custodian
		word Custouran
	treating counselor	
	-	will collectively address the non-wage
	· ·	t; teaching jury about anxiety, panic
		planation of the subjects identified in
	expert disclosures for her	

other trial witnesses:			
	liability, economic damages, punitive damages		
No.	WITNESS NAME	WITNESS ADDRESS	
	Gentill Abdulla	9613 Bayou Brook Street	
		Houston, Texas 77063	
	Live □ Deposition		
	Fact □ Expert □ Re	cord Custodian	
	with inside sales team includin topics: basic background; compa and pay equity training, superv prevention and enforcement; or operations; his experience and operation; comparative skill of the	lyst who reported to Luis Lugo and worked g Mr. Dedmon any policies and practices; discrimination vision, enforcement; discrimination ganizational and pay structures and observations related to his work and lose he worked with on the inside sales atment of workers based on protected	
No.	WITNESS NAME	WITNESS ADDRESS	
	Gaurdie E. Banister	2415 San Felipe Street #9 Houston, Texas 77019-2509	
	former Shell employee; director Enbridge, Dow, Tyson Foods, at Different Points of View; Chair and Leadership Development C topics: basic background; histor observation and experience; his	ry of race discrimination at Shell based on quote in the Original Petition and Jury table compensation systems; preventing	

No.	WITNESS NAME	WITNESS ADDRESS
2101	Jim Barker	Shell 150 N. Dairy Ashford Houston, Texas 77090
	Live   Deposition	
	■ Fact □ Expert □ Re	cord Custodian
	and pay equity training, superv prevention and enforcement; or account assignment structures gross margin tracking; his own	any policies and practices; discrimination vision, enforcement; discrimination ganizational, pay, customer account, and and operations; performance metrics and pay and job grades; his experience and and position on the inside sales team;
No.	WITNESS NAME Lisa Billington	WITNESS ADDRESS 3000 Bissonnet Street, Apt. 7110 Houston, Texas 77005
	former human resources profes topics: basic background; compared and pay equity training, supervention and enforcement; preday of payroll; involvement and related to the job duties position for; company promises, policies.	any policies and practices; discrimination vision, enforcement; discrimination re-employment process from offer to first knowledge about 2014 hiring process in that Mr. Dedmon was ultimately hired, and requirements concerning diversity, hip of different entities as relevant to this

No.	WITNESS NAME	WITNESS ADDRESS
2.0.	Beth Bowman	Targa
		811 Louisiana, Suite 2100
		Houston, Texas 77002
	Live □ Deposition	
	$\blacksquare$ Fact $\square$ Expert $\square$ Re	cord Custodian
		r Shell and direct supervisor for Sri
	Rangan	1
		any policies and practices; discrimination
		rision, enforcement; discrimination ganizational, pay, customer account, and
		and operations; performance metrics and
	=	pay and job grades; her experience and
		k and position; involvement and knowledge
		ed to the job duties position that Mr.
	_	or; company promises, policies, and
	1	sity, equity, and inclusion; relationship of this case; observed differential treatment
		haracteristics; existence and location of
	missing documents	inaracteristics, existence and recation of
No.	Witness Name	WITNESS ADDRESS
No.		1 Acosta Valley Drive
No.	Witness Name	
No.	Witness Name	1 Acosta Valley Drive
No.	WITNESS NAME  Robert Dedmon  Live	1 Acosta Valley Drive
No.	WITNESS NAME  Robert Dedmon  Live	1 Acosta Valley Drive Missouri City, Texas 77459
No.	WITNESS NAME  Robert Dedmon  Live	1 Acosta Valley Drive Missouri City, Texas 77459 cord Custodian
No.	WITNESS NAME  Robert Dedmon  Live	1 Acosta Valley Drive Missouri City, Texas 77459 cord Custodian
No.	WITNESS NAME  Robert Dedmon  Live	1 Acosta Valley Drive Missouri City, Texas 77459 cord Custodian
No.	WITNESS NAME  Robert Dedmon  Live	1 Acosta Valley Drive Missouri City, Texas 77459 cord Custodian
No.	WITNESS NAME  Robert Dedmon  Live	1 Acosta Valley Drive Missouri City, Texas 77459 cord Custodian
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No.	WITNESS NAME  Robert Dedmon  Live	1 Acosta Valley Drive Missouri City, Texas 77459 cord Custodian
No.	WITNESS NAME  Robert Dedmon  Live	1 Acosta Valley Drive Missouri City, Texas 77459 cord Custodian
No.	WITNESS NAME  Robert Dedmon  Live	1 Acosta Valley Drive Missouri City, Texas 77459 cord Custodian
No.	WITNESS NAME  Robert Dedmon  Live	1 Acosta Valley Drive Missouri City, Texas 77459 cord Custodian

No.	WITNESS NAME	WITNESS ADDRESS
	Michael Deley	Shell
		150 N. Dairy Ashford
		Houston, Texas 77090
	Live   Deposition	
	Fact □ Expert □ Re	cord Custodian
	and pay equity training, superv prevention and enforcement; or account assignment structures gross margin tracking; his own observations related to his world	any policies and practices; discrimination vision, enforcement; discrimination ganizational, pay, customer account, and and operations; performance metrics and pay and job grades; his experience and a and position on the inside sales team; the fill a vacant position on the team in 2021;
No.	WITNESS NAME	WITNESS ADDRESS
	Megan Foltz (Rozelle)	409 W. 24th Street Houston, Texas 77008
		Houston, Texas 17000
	Live    Deposition	
	■ Fact □ Expert □ Re	cord Custodian
	and pay equity training, superv prevention and enforcement; co requirements concerning divers different entities as relevant to about 2014 and 2015 hiring pro	any policies and practices; discrimination vision, enforcement; discrimination

No.	WITNESS NAME	WITNESS ADDRESS
	Patrick Frnka	Shell
		150 N. Dairy Ashford Houston, Texas 77090
		Tiouston, Texas 77000
	Live Deposition	
		cord Custodian
	and pay equity training, superv prevention and enforcement; or account assignment structures gross margin tracking; his own observations related to his work	any policies and practices; discrimination vision, enforcement; discrimination ganizational, pay, customer account, and and operations; performance metrics and pay and job grades; his experience and k and position on the inside sales team; the fill a vacant position on the team in 2021;
Mo	Warner of N. 1	Warnings Approps
No.	WITNESS NAME Jennifer Hartnett	WITNESS ADDRESS address unknown
		c/o Marlene Williams Ogletree, Deakins, Nash, Smoak & Stewart, P.C. 500 Dallas Street, Suite 2100 Houston, Texas 77002 (713) 655-0855
	Live   Deposition	<u> </u>
		cord Custodian
	former Shell manager	cora Oustouran
	topics: basic background; compared and pay equity training, supervention and enforcement; correquirements concerning divers different entities as relevant to about 2014 and 2015 hiring promises, policies, and requirements, relationship of different entities as relevant to about 2014 and 2015 hiring promises, policies, and requirements of the control	sity, equity, and inclusion; relationship of this case; involvement and knowledge cess related to the job duties positions that ered; her own pay and job grades; company ments concerning diversity, equity, and ent entities as relevant to this case; res based on protected characteristics;

No.	WITNESS NAME	WITNESS ADDRESS
	Tim Hood	Mercuria Energy America
		20 Greenway Plaza #650
		Houston, Texas 77046
	Live   Deposition	
	Fact □ Expert □ Re	cord Custodian
	and pay equity training, superv prevention and enforcement; or operations; performance metric	any policies and practices; discrimination vision, enforcement; discrimination ganizational and pay structures and s and revenue or profit tracking; his own nee and observations related to his work
No.	WITNESS NAME	Witness Address
NO.	Doug Hund	Shell 150 N. Dairy Ashford Houston, Texas 77090
	Live   Deposition	
	■ Fact □ Expert □ Re	cord Custodian
	and pay equity training, superv prevention and enforcement; or account assignment structures gross margin tracking; power v his experience and observations inside sales team; the events su	les team with Mr. Dedmon any policies and practices; discrimination rision, enforcement; discrimination ganizational, pay, customer account, and and operations; performance metrics and ersus gas sales; his own pay and job grades; a related to his work and position on the arrounding the need to fill a vacant position and location of missing documents

No.	WITNESS NAME	WITNESS ADDRESS	
	Sarah Hutnek	1217 W. 16 <sup>th</sup> Street	
		Houston, Texas 77008	
	Live Deposition		
	Fact □ Expert □ Re	cord Custodian	
	former Shell human resources of		
		any policies and practices; discrimination	
	prevention and enforcement; co	rision, enforcement; discrimination	
		sity, equity, and inclusion; relationship of	
		this case; involvement and knowledge	
		e of discrimination; existence and location	
	of missing documents		
3 -			
No.	WITNESS NAME	WITNESS ADDRESS	
	Ryan Kolkmann	Shell 150 N. Dairy Ashford	
		Houston, Texas 77090	
	Live    Deposition		
	Fact □ Expert □ Re	cord Custodian	
	Shell employee on the inside sa	les team with Mr. Dedmon	
	topics: basic background; company policies and practices; discrimination		
	and pay equity training, supervision, enforcement; discrimination		
	<del>-</del>	ganizational, pay, customer account, and	
	account assignment structures and operations; performance metrics and gross margin tracking; his own pay and job grades; his experience and		
		x and position on the inside sales team; the	
		l so the need to fill a vacant position on the	
	team in 2021; existence and loc	ation of missing documents	

No.	WITNESS NAME	WITNESS ADDRESS
	James Ledbetter	6307 Flewellen Falls Lane
		Fulshear, Texas 77441
	Live    Deposition	
	Fact □ Expert □ Re	cord Custodian
	former Shell employee	
		any policies and practices; discrimination
		rision, enforcement; discrimination
	· · · · · · · · · · · · · · · · · ·	ganizational and pay structures and grades; his experience and observations
		i; the internal resolution process; observed
	——————————————————————————————————————	rs based on protected characteristics;
	existence and location of missin	
No.	WITNESS NAME	WITNESS ADDRESS
	Meredith Lilly	Mercuria Energy America
		20 Greenway Plaza #650
		Houston, Texas 77046
	<b>T. T.</b>	
	Live □ Deposition	
	Fact □ Expert □ Re	cord Custodian
	Shell employee on the inside sa	les team with Mr. Dedmon
		any policies and practices; discrimination
		rision, enforcement; discrimination
	_	ganizational, pay, customer account, and
	_	and operations; performance metrics and
	9	pay and job grades; her experience and
		k and position on the inside sales team; her
	offer of employment at JG5 for the same job duties roles later offered to Mr. Dedmon; existence and location of missing documents	
	Mi. Deumon, existence and loca	ation of missing documents

No.	WITNESS NAME	WITNESS ADDRESS
	Grace Loh	150 N. Dairy Ashford
		Houston, Texas 77090
	■ Live □ Deposition	
	Fact □ Expert □ Re	cord Custodian
	Shell employee applicant for th Deley	e open 2021 raise that was given to Michael
	topics: basic background, the proverall process concerning same	rocess surrounding her application and
	overall process concerning same	
No.	WITNESS NAME	Witness Address
	Luis Lugo	13802 Majestic Spring Lane
		Humble, Texas 77396
	Live Deposition	
	1= -	cord Custodian
		rgy trading; current Vice President and
	Head of ERCOT Trading for Me	
		leclaration; basic background; company
		nation and pay equity training, supervision,
		evention and enforcement; organizational
	- · ·	ons; performance metrics and revenue or
		d job grades; his experience and
		x and position; observed differential
	location of missing documents	protected characteristics; existence and
	location of missing documents	
No.	WITNESS NAME	WITNESS ADDRESS
110.	Logan Luzzi	Shell
	g	150 N. Dairy Ashford
		Houston, Texas 77090
		,
	Live    Deposition	
	■ Fact □ Expert □ Re	cord Custodian
	Shell employee on the inside sa	les team with Mr. Dedmon
	•	any policies and practices; discrimination
	2 0 2 0 2	vision, enforcement; discrimination
		ganizational, pay, customer account, and
	<u> </u>	and operations; performance metrics and
	gross margin tracking; his own	pay and job grades; his experience and

	observations related to his work and position on the inside sales team; existence and location of missing documents	
No.	WITNESS NAME	WITNESS ADDRESS
	Sean Matthews	30232 Post Oak Run Magnolia, Texas 77355
	Live   Deposition	
	Fact □ Expert □ Re	cord Custodian
	topics: basic background; compared and pay equity training, supervention and enforcement; or operations; performance metric pay and job grades; his experient and position; observed different	rent head of Midwest Sales at Mercuria any policies and practices; discrimination rision, enforcement; discrimination ganizational and pay structures and s and revenue or profit tracking; his own and observations related to his work rial treatment of workers based on aports about pay disparities to Glenn of missing documents
No.	WITNESS NAME	WITNESS ADDRESS
	Laura Moses	Shell 150 N. Dairy Ashford Houston, Texas 77090
	Live   Deposition	
	Fact □ Expert □ Re	cord Custodian
	Shell employee relations advisor topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; involvement and knowledge about response to EEOC charge of discrimination; existence and location of missing documents	

No.	WITNESS NAME	WITNESS ADDRESS
2.0.	Priscilla Partida	Shell
		150 N. Dairy Ashford
		Houston, Texas 77090
	Live Deposition	
	Fact $\square$ Expert $\square$ Re	cord Custodian
	Dedmon worked topics: basic background; compared and pay equity training, supervention and enforcement; or account assignment structures gross margin tracking; her own observations related to her work	ger on the inside sales team where Mr.  any policies and practices; discrimination vision, enforcement; discrimination ganizational, pay, customer account, and and operations; performance metrics and pay and job grades; her experience and k and position on the inside sales team;
	-	rential treatment of workers based on
	protected characteristics; existe	ence and location of missing documents
No.	WITNESS NAME	Witness Address
110.	Teri Ramsey	3003 Eagle Ridge Way
	(Cornelius-Olmen)	Houston, Texas 77084
	Live    Deposition	
	Fact □ Expert □ Re	cord Custodian
	former Shell human resources manager for Shell topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; involvement and knowledge about 2014 and 2015 hiring process related to the job duties positions the Mr. Dedmon was ultimately offered; existence and location of missing documents	

No.	WITNESS NAME	WITNESS ADDRESS
	Srikala (Sri) Rangan	30 Dorthea Lane
		Sugar Land, Texas 77479
	Live    Deposition	
	Fact □ Expert □ Re	cord Custodian
	policies and practices; discrimination promises, policies, and requirer inclusion; relationship of difference organizational, pay, account, an operations; performance metric tracking; her own pay and job grelated to her work and position workers based on protected charabout 2014 and 2015 hiring promise. Dedmon was ultimately him of race discrimination in this care	declaration; basic background; company nation and pay equity training, supervision, evention and enforcement; company ments concerning diversity, equity, and ent entities as relevant to this case; and account assignment structures and s and revenue, profit, and gross margin grades; her experience and observations in; observed differential treatment of aracteristics; involvement and knowledge because related to the job duties position that ared for and then moved to; direct evidence ase; her EEO report to Shell; her perience concerning all of the above;
		XXX A
No.	WITNESS NAME	WITNESS ADDRESS
	Chris Riley	204 Vincent Street Houston, Texas 77009
	Live    Deposition	
	Fact □ Expert □ Re	cord Custodian
	Shell employee on Defendants' witness list topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; organizational, pay, account, and account assignment structures and operations; performance metrics and revenue, profit, and gross margin tracking; her own pay and job grades; existence and location of missing documents	

No.	WITNESS NAME	WITNESS ADDRESS
	Raif Rucker	204 Vincent Street
		Houston, Texas 77009
	■ Live □ Deposition	
	Fact □ Expert □ Re	cord Custodian
	and pay equity training, superv prevention and enforcement; or account assignment structures gross margin tracking; his own observations related to his worl observed and experienced differ	les team with Mr. Dedmon any policies and practices; discrimination rision, enforcement; discrimination ganizational, pay, customer account, and and operations; performance metrics and pay and job grades; his experience and and position on the inside sales team; rential treatment of workers based on ence and location of missing documents
		ŭ
No.	WITNESS NAME	Witness Address
	Robyn L. Sutton	Shell 1000 Main Street Houston, Texas 77010
	Live □ Deposition	
	■ Fact □ Expert □ Re	cord Custodian
	Shell Trading & Supply human resources manager topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; company promises, policies, and requirements concerning diversity, equity, and inclusion; relationship of different entities as relevant to this case; involvement and knowledge about 2014 and 2015 hiring process related to the job duties positions the Mr. Dedmon was ultimately offered; existence and location of missing documents	

No.	WITNESS NAME	WITNESS ADDRESS
	Michael Tickle	Shell
		150 N. Dairy Ashford
		Houston, Texas 77090
	Live   Deposition	
	Fact □ Expert □ Re	cord Custodian
	topics: basic background; compared and pay equity training, supervention and enforcement; or account assignment structures gross margin tracking; his own observations related to his workevents surrounding the need to	les team where Mr. Dedmon worked any policies and practices; discrimination vision, enforcement; discrimination ganizational, pay, customer account, and and operations; performance metrics and pay and job grades; his experience and k and position on the inside sales team; the fill a vacant position on the team in 2021; mance data; existence and location of
No	Withings Mark	Wimnings Appress
No.	WITNESS NAME Ken Ueng	WITNESS ADDRESS Shell
	Ken Ceng	150 N. Dairy Ashford
		Houston, Texas 77090
	Live   Deposition	
	Fact □ Expert □ Re	cord Custodian
	Shell employee on the inside sales team with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and gross margin tracking; his own pay and job grades; his experience and observations related to his work and position on the inside sales team; existence and location of missing documents	

No.	WITNESS NAME	WITNESS ADDRESS
	Erin Verdon	Shell
		150 N. Dairy Ashford Houston, Texas 77090
		Trousion, Texas 17000
	Live   Deposition	
	■ Fact □ Expert □ Re	cord Custodian
	employment offer letter for Mr. topics: basic background; compared and pay equity training, supervention and enforcement; correquirements concerning divers different entities as relevant to about 2014 hiring process relat	any policies and practices; discrimination vision, enforcement; discrimination
	documents	
No.	WITNESS NAME	WITNESS ADDRESS
	D'Andra Wallace	Total Energies 1201 Louisiana Street, Suite 1800 Houston, Texas 77002
	Live Deposition	
	Fact □ Expert □ Re	cord Custodian
	former Shell employee who worked with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational and pay structures and operations; her own pay and job grades; her experience and observations related to her work and position; observed and experienced differential treatment of workers based on protected characteristics; her experience and observations related to her work with Mr. Dedmon	

No.	WITNESS NAME	WITNESS ADDRESS
	Kendra Williams	Shell 150 N. Dairy Ashford Houston, Texas 77090
	Shell recruiter topics: basic background; compa and pay equity training, superv prevention and enforcement; co requirements concerning divers different entities as relevant to about 2014 hiring process relate	any policies and practices; discrimination rision, enforcement; discrimination mpany promises, policies, and sity, equity, and inclusion; relationship of this case; involvement and knowledge ed to the job duties positions that Mr.; existence and location of missing
	documents	,
No.	WITNESS NAME	WITNESS ADDRESS
NO.	Glenn T. Wright	Shell 150 N. Dairy Ashford Houston, Texas 77090
	Live Deposition  Fact Expert Record Custodian  Current SVP for Shell  topics: Shell employee on the inside sales team with Mr. Dedmon topics: basic background; company policies and practices; discrimination and pay equity training, supervision, enforcement; discrimination prevention and enforcement; organizational, pay, customer account, and account assignment structures and operations; performance metrics and revenue or profit tracking; his own pay and job grades; his experience and observations related to his work and position; observed differential treatment of workers based on protected characteristics; reports he received about pay disparities based on race; relationship of different entities as relevant to this case; Sri Rangan's disclosure of discrimination to Mr. Dedmon and his negative reaction to same; existence and location of missing documents	

post-verdict witnesses:			
attorneys' fees			
No.	WITNESS NAME	WITNESS ADDRESS	
	Amy E. Gibson	Gibson Wiley PLLC	
		1500 Jackson Street #109	
		Dallas, Texas 75201-4923	
	Live   Deposition		
	Fact Expert Re	cord Custodian	
		l of record in this civil action for Robert	
	Dedmon. She is expected to test	tify on attorneys' fees.	
) I -	W	W	
No.	WITNESS NAME Andrew Golub	WITNESS ADDRESS	
	Andrew Golub	Dow Golub Remels & Gilbreath, PLLC 2700 Post Oak Boulevard, Suite 1750	
		Houston, Texas 77056	
		Troubton, Tonds 11000	
	Live   Deposition		
	Fact Expert Re	cord Custodian	
	He is expected to testify as an e	expert on attorneys' fees.	
No.	WITNESS NAME	WITNESS ADDRESS	
	Amanda C. Hernandez	AH Law, PLLC	
		5718 Westheimer, Suite 1000 Houston, Texas 77057	
		Tiouston, Texas 17001	
	Live    Deposition		
	Fact Expert Re	cord Custodian	
	Of counsel and counsel of record	d in this civil action for Robert Dedmon.	
	She is expected to testify on att	orneys' fees.	
No.	WITNESS NAME	WITNESS ADDRESS	
1.0,	Brian Sanford	Sanford Firm	
		Attorneys at Law	
		1910 Pacific Avenue, 15th Floor	
		Dallas, Texas 75201	
	☐ Live ☐ Deposition		
	Fact Expert Re	cord Custodian	
	He is expected to testify as an expert on attorneys' fees.		

No.	WITNESS NAME	WITNESS ADDRESS
	David L. Wiley	Gibson Wiley PLLC
		1500 Jackson Street #109
		Dallas, Texas 75201-4923
	☐ Live ☐ Deposition	
	Fact ■ Expert □ Re	cord Custodian
	Of counsel and counsel of record in this civil action for Robert Dedmon. He is expected to testify on attorneys' fees.	

Date: March 6, 2025 Respectfully submitted,

## /s/ Amy Gibson

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and

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Attorneys for Robert Dedmon